ENVIRON

September 12, 1991

Mr. Joseph D. Ritchey
Heritage Remediation/Engineering, Inc.
Toledo Division
5656 Opportunity Drive
Toledo, Ohio 43612

Re: **Transmittal of Responses to the NJDEP July 12, 1991 Letter for Inclusion in the September Monthly Project Status Report, Former Hexcel Corporation Facility, Lodi, New Jersey**

Dear Joe:

The following letter and enclosures are intended as responses to Items A-1(a,d,e), A-2(a,b.ii), A-4, A-6, B-1, B-2, B-3, B-4, B-5(a-d,g,h), and B-6.a of the NJDEP's July 12, 1991 letter. These responses have been prepared for inclusion in the September Monthly Project Status Report.

Responses to all items which pertain to requests for further sampling (Items A-1(a,d,e), A-2.a, B-2, B-3, B-4, B-5(b,c,g), and B-6.a) were presented in the August 9, 1991 letter to the NJDEP (presented here as Enclosure A). This letter was discussed in the August 29, 1991 meeting between Hexcel, Heritage, and NJDEP, and we are awaiting a response from the NJDEP as to whether or not the sampling plan presented therein is acceptable. A revised Summary of Soil Soil Analysis Data Map (Item A-4) and isopleth maps for VOCs and DNAPL (Item B-5.d) are included here as Enclosures B and C, respectively. The proposal for a soil vapor extraction system (Item A-6) will be presented in the October progress report, as agreed to in the August 29, 1991 meeting. Responses for Items A-2.b.ii, B-1, B-5.a, and B-5.h(i-ii) are presented below. For clarity of presentation, each item is presented below in its original form, followed by our response to that item.

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A - SOILS

2. *Item 21 - Storm Sewer Outfall*

b. Quality Assurance/Quality Control Data (QA/QC)

ii. ENVIRON's response to Condition 21.B.3 & 4 of the Cleanup Plan Approval letter is unacceptable. ENVIRON reports subtracting methylene chloride blank results before reporting results. This is unacceptable, particularly in view of the fact that methylene chloride is a primary use compound for the site as well as a suspected carcinogen. Data may be qualified with a "B" if blank contamination criteria are met. In no case may blank correction be made. Hexcel shall submit, with the Progress Report due August 15, 1991, a revised data package reporting the analytical results with blank subtraction.

RESPONSE

As indicated in the letter from ENVIRON that was included as Appendix E of the Interim Project Report, methylene chloride results in the Summary Table of Analytical Results (which was also included in Appendix E) were reported with a "B" qualifier if the chemical was also detected in the blank. No blank corrections were applied to the concentrations listed in the summary table. Samples 0107-SB02 and 0108-SB02 were omitted from the summary table, however, because methylene chloride was the only volatile organic compound (VOC) detected in those samples, and the parameter was also detected in the blank at a concentration in excess of the Action Level for VOCs. The summary table presented here as Enclosure D has been modified to include the results for these samples.

B - GROUND WATER

1. *Amended DNAPL Cleanup Plan*

The Department has reviewed the Amended DNAPL Cleanup Plan dated September 18, 1990 and finds it acceptable, with the following comments regarding the ground water pumping strategy. Recovery Option 1 entails pumping select CW series wells. The treatment system is sized to treat flows of up to 10,000 gallons per day. Option 1 delivers approximately 13,500 gallons per day. Hexcel shall specify the disposition of the daily surplus of 3,000 gallons of ground water. Hydraulic control is best achieved by continuous pumping, not pulse pumping, therefore Hexcel shall propose a recovery rate which entails continuous pumping which can be accommodated by the treatment system.

Recovery Option 2 entails injecting treated water into CW series wells to form a hydraulic barrier. Hexcel shall specify how this system will prevent DNAPL migration from those CW wells containing DNAPL into the Saddle River. In addition, Hexcel shall conduct the tasks outlined in the Additional Ground Water Requirements section below.

RESPONSE

The ground water treatment system is designed to accommodate a flow rate of 15 gallons per minute, or 21,600 gallons per day. The quantity of ground water extracted under Option 1 is therefore well within the capacity of the treatment system. Hexcel has no plans for extracting ground water at a rate in excess of the rate at which ground water can be treated.

The ground water extraction system is designed to maintain a constant drawdown in the shallow aquifer. Because the aquifer recovers relatively slowly, it is likely that constant pumpage from the extraction wells would cause the wells to go dry. Constant aquifer drawdown, and subsequent optimum hydraulic control, will therefore likely be achieved by on/off cycling of the pumps.

Reinjection of ground water into CW series well under Recovery Option 2 would not occur in wells which exhibit the presence of DNAPL.

5. *Additional Ground Water Requirements*

a. *Hexcel shall submit, with the Progress Report due on August 15, 1991, a proposal for product recovery beneath the Boiler Room. Hexcel shall investigate all options, including pumping from MW-3 and MW-16, installation and operation of recovery wells between MW-2 and MW-16, and/or installation of larger diameter horizontal drains beneath the boiler room through the Building I sump room wall.*

RESPONSE

Product thickness measurements for both floating oil and DNAPL in all accessible wells in the vicinity of Building I were conducted on August 6, 1991. A summary table of the measurements is presented in Enclosure E. As indicated in the table, floating product was detected in three wells. The floating product thickness in piezometer P-2, located inside the boiler room, was 0.05 feet. No measurable oil was detected in any of the other wells inside or directly adjacent to Building I or the boiler room. Installation and operation of additional wells or drains is not anticipated to be effective for oil recovery at this time, because oil does not appear to be present.

h. *The Department has recently become aware that the Passaic Valley Sewerage Commission (PVSC) may only grant temporary approval for the decontaminated ground water discharge for 6 months. In addition, Hexcel may still need to obtain a New Jersey Pollution Discharge Elimination System (NJPDES) Significant Industrial User (SIU) Permit prior to discharging the decontaminated ground water into the sewer system. Hexcel shall immediately investigate all methods/routes for disposal of the decontaminated ground water, including off-site disposal. Hexcel shall submit, with the Progress Report due on August 15, 1991:*

i. *Clarification on whether an NJDPES SIU Permit is required and the status of negotiations with the PVSC regarding approval to discharge temporarily and/or permanently.*

RESPONSE

Hexcel was informed by the Bureau of Industrial Discharge Permits, SIU Section, in a letter dated December 4, 1990, that the ground water treatment facility falls under the criteria set forth in N.J.A.C 7:14A-4.2 (IWMF eligibility) and that Hexcel is therefore required to obtain an individual NJDPES/SIU permit pursuant to N.J.A.C. 7:14A-10.5(a)1.ii. According to Jeffrey Thein, the review officer for SIU permits, an SIU permit is required for temporary discharges as well as permanent discharges. We have reviewed the pertinent regulations and have not identified any exemptions for which the treatment system would potentially qualify. It is our understanding that regulations may be promulgated as early as Fall 1991 which would eliminate the requirement that certain facilities having discharge approvals from local POTWs would not be required to obtain SIU permits. Hexcel's SIU permit application was submitted in January 1990, and at this time we are awaiting notice from the Bureau that either the SIU permit has been granted or that the permit is no longer necessary.

ii. *A proposal evaluating reinjection to one or both overburden aquifers, at the upgradient and/or the downgradient property boundaries.*

RESPONSE

Reinjection systems are generally difficult to implement for long-term operation. High mineral concentrations, silts, sands, and air entrained in the injected water can cause fouling, clogging, and vapor locking of the injection wells or trenches. It is likely that the low permeability of soils at the facility would enhance these problems, potentially rendering the reinjection systems inoperable. Operation and maintenance costs associated with reinjection systems

would likely be prohibitively high because the systems often require periodic replacement to address the difficulties mentioned above. Reinjection is therefore not considered to be feasible at this site.

Hexcel has investigated other options for disposal of treated ground water, as discussed in a letter to the PVSC dated April 8, 1991 (presented here as Enclosure F). Although at this time we believe that neither discharge to surface water nor reinjection are appropriate disposal options for treated ground water at the Lodi facility, we understand from the agreement reached in the aforementioned August 29 meeting that both of these options must be retained as contingencies in the event that no other discharge options are available. We are therefore currently in the process of preparing NJPDES applications for both of these discharges.

Please let me know if you have any questions or comments regarding the information presented in this letter.

Sincerely,

Renée van de Griend, Ph.D.
Senior Associate

Enclosures 6

cc: A. William Nosil, Hexcel Corporation

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